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*Attorney for Defendant Vidocq Society*

UNITED STATES DISTRICT COURT  
DISTRICT OF OREGON  
EUGENE DIVISION

NICHOLAS JAMES MCGUFFIN, as an individual and as guardian *ad litem*, on behalf of S.M., a minor,

Plaintiffs,

v.

MARK DANNELS, PAT DOWNING, SUSAN HORMANN, MARY KRINGS, KRIS KARCHER, SHELLY MCINNES, RAYMOND MCNEELY, KIP OSWALD, MICHAEL REAVES, JOHN RIDDLE, SEAN SANBORN, ERIC SCHWENNINGER, RICHARD WALTER, CHRIS WEBLEY, ANTHONY WETMORE, KATHY WILCOX, CRAIG ZANNI, DAVID ZAVALA, JOEL D. SHAPIRO AS ADMINISTRATOR OF THE ESTATE OF DAVID E. HALL, VIDOCQ SOCIETY, CITY OF COQUILLE, CITY OF COOS BAY, and COOS COUNTY,

Defendants.

NO. 6:20-CV-01163-MK

DECLARATION OF BARBARA J. COHAN IN SUPPORT OF VIDOCQ SOCIETY'S MOTION FOR PROTECTIVE ORDER

I, Barbara J. Cohan, declare:

1. I am an attorney licensed to practice in the Commonwealth of Pennsylvania.
2. I am a current member of the Vidocq Society, a defendant in this case.
3. My position in the Vidocq Society is Public Information Officer and Member, Board of Directors.
4. I have personal knowledge of the matters attested to in this declaration.
5. I have personal knowledge that the proposed discovery sought by Plaintiffs would be incredibly burdensome to the Vidocq Society for the following reasons:
  - a. The requested discovery sought by Plaintiffs involves information unrelated to the Leah Freeman investigation.
  - b. The Vidocq Society is a volunteer organization with no central repository.
  - c. The Vidocq Society exists to provide private and confidential help, where it can, to solve cold cases.
  - d. The proposed discovery sought by Plaintiffs, if compelled, threatens to destroy the Vidocq Society by breaching, without good reason, the strict confidentiality that is central to its mission.
6. I have personal knowledge that the proposed discovery sought by Plaintiffs is a threat to the privacy, confidentiality and overall existence of the Vidocq Society.
7. Due to the nature of Vidocq Society, the membership list is often changed and updated due to members joining, retiring and/or passing away.
8. The information on Vidocq Society's website, <https://www.vidocq.org/>, is up-to-date and accurate.

I declare under penalty of perjury under the laws of the United States that the foregoing is true and correct to the best of my knowledge, information, and belief.

EXECUTED this 15<sup>th</sup> day of September, 2023

/s/  
Barbara J. Cohan

HWS LAW GROUP

BY /s/ Anthony R. Scisciani

BY /s/ Kelsey L. Shewbert

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Attorneys for Defendant Vidocq Society

CERTIFICATE OF SERVICE

I certify under penalty of perjury under the laws of the State of Oregon, that the following is true and correct:

I am employed by the law firm of HWS Law Group.

At all times hereinafter mentioned, I was and am a citizen of the United States of America, a resident of the State of Washington, over the age of eighteen (18) years, not a party to the above-entitled action, and competent to be a witness herein.

On the date set forth below I served the document(s) to which this is attached, in the manner noted on the following person(s):

PARTY/COUNSEL	DELIVERY INSTRUCTIONS
<u>CO / Plaintiffs</u> Janis C. Puracal Andrew C. Lauersdorf Maloney Lauersdorf Reiner PC 1111 E. Burnside Street, Suite 300 Portland, OR 97214	<input type="checkbox"/> Via U.S. Mail <input type="checkbox"/> Via E-Mail <input type="checkbox"/> Via Overnight Mail <input checked="" type="checkbox"/> Via Court E-Service, if applicable jcp@mlrlegalteam.com acl@mlrlegalteam.com
<u>CO / Plaintiffs</u> David B. Owens, <i>Pro Hac Vice</i> Loevy & Loevy 100 S. King Street, Suite 100 Seattle, WA 98104-2885	<input type="checkbox"/> Via U.S. Mail <input type="checkbox"/> Via E-Mail <input type="checkbox"/> Via Overnight Mail <input checked="" type="checkbox"/> Via Court E-Service, if applicable david@loevy.com
<u>CO / Defendants City of Coquille, City of Coos Bay, Coos County, Craig Zanni, Chris Webley, Eric Schwenninger, Sean Sanborn, Rav McNeely, Kris Karcher, Pat Downing, Mark Dannels, Kip Oswald, Michael Reaves, David Zavala, Anthony Wetmore and Shelly McInnes</u> Robert E. Franz, Jr. Sarah R. Henderson Law Office of Robert E. Franz, Jr. PO Box 62 Springfield, OR 97477	<input type="checkbox"/> Via U.S. Mail <input type="checkbox"/> Via E-Mail <input type="checkbox"/> Via Overnight Mail <input checked="" type="checkbox"/> Via Court E-Service, if applicable rfranz@franzlaw.comcastbiz.net shenderson@franzlaw.comcastbiz.net
<u>CO / Defendants John Riddle, Susan Hormann, Mary Krings and Kathy Wilcox</u> Jesse B. Davis Todd Marshall Oregon Department of Justice 100 SW Market Street Portland, OR 97201	<input type="checkbox"/> Via U.S. Mail <input type="checkbox"/> Via E-Mail <input type="checkbox"/> Via Overnight Mail <input checked="" type="checkbox"/> Via Court E-Service, if applicable Todd_marshall@doj.state.or.us Jesse.b.davis@doj.state.or.us

DATED this 15th day of September, 2023

*s/ Abby Jenkins*

Abby Jenkins, Legal Assistant